

# In The United States District Court For The Middle District Of Pennsylvania

Gartor Kiki Brown

FILED  
SCRANTON

MAY 26 2020

V.

PER

DEPUTY CLERK

NO. 18-CV-01527

LT. Maxwell et. al.,

## Plaintiff's Brief To Consult With The Court Pursuant TO Discovery Issue

This is not a case were defendants forgot to dot their "i" or cross their "t" thus Browns claims alleged are VERY serious.

Defendants are playing a game of blind man's bluff with important documents pursuant to the case at hand. Under Rule 26(a) it requires the disclosure of certain information at the start of discovery, specifically the rule required that parties disclose without request, a copy, or a description by category and location of all documents, electronically stored information, and tangible things etc.

In multiple discovery requests Plaintiff requested IRC team documents not limited to Classification & housing of inmates policies.

The courts limited Plaintiff's discovery request by a camera review of IRC Documents & the inmate's misconduct history & PREA investigations covering the six months prior to the alleged incident and an affidavit as to why the policies relating to classification & housing inmates is privilege.

Plaintiff received only a copy of a letter addressed to Judge Jones from a MS. Bedell claiming that "IRC" stands for "Initial Review Committee" & only evaluate inmates when they are new to the institution, thus because the inmate was transferred to SCI Huntinton in 2009 only the documents from the 2009 evaluation would reflect or be consistent with court order. This may be misleading. Brown objects as "counselors", "psych" members of "IRC" are all members of the "IRC" team. So all IRC team documents "relating to inmate Allen" should include not only a IRC evaluation from 2009 but all set documents from all "IRC" members covering six months prior to the alleged incident. This may, include documents from the inmate "ICAR" conclusion of PRC meeting, "counselors note", "psych notes" etc.

Limiting the IRC team Documents to a evaluation from 2009 would be manifestly unjust.

Thus the Doc or "official agency Policies" are left in a "dust bowl" & safeguarded by agency lawyers; Browns claims are like a strong wind, uncovering & exposing set Policies from the "dust bowl" to identify the printed texture, showing how officials actions contradict what is printed. It's essential that the court bring a magnifying lens to the issue at hand; nor should the court be laded to the impact of the method in which the agency set its Policies on the shelf cover in a "dust bowl" only applying these Policies that is safeguarded when beneficial to the agency.

IN PART OF THE CLASSIFICATIONS POLICIES & POLICIES PURSUANT TO housing inmates; The court should ask "Why are these Policies safeguarded from those it intended to protect? Clearly the Policies are not law, but it's tolerated in the civil system only if applied, in addition if the classification & housing Policies were strictly apply & enforced pursuant to Browns claims why claim "official information privilege in particular why not have Brown & the courts view them for public interest? or is this a case where officials actions are so "out far" from the "textual prints" that they are compromised? Thus Plaintiff declare he has already proven his case through summary judgment & may not even need such Policies because the facts are clear, however the court must draw a line in the sand, see relating cases: Roberto Camacho v. R.J. Dean 2018 U.S. Dist. Lexis 60696, Landau v. Lamas, 2018 U.S. Dist. Lexis 176031 (M.D. Pa. Oct. 11, 2018)

Inmate Name Garfor Brown DC# NA6401 INMATE MAIL  
Housing Unit: \_\_\_\_\_  
SCI Forest  
PO Box 945  
Marienville, PA 16239

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